

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of Plaintiffs' Steering Committee's Opposition to Defendants' Motion to Exclude Dr. Daniel Clarke-Pearson.

2. Attached hereto as Exhibit 1 is a true and correct copy of Sir Austin Bradford Hill, Proceedings of the Royal Society of Medicine, "The Environment and Disease: Association or Causation" (1965).

3. Attached hereto as Exhibit 2 is a true and correct copy of O'Brien KM, et al. Intimate Care Products and Incidence of Hormone-Related Cancers: A Quantitative Bias Analysis. J Clin Oncol 00:1-15 (2024).

4. Attached hereto as Exhibit 3 is a true and correct copy of Stayner L., et al. Carcinogenicity of Talc and Acrylonitrile. The Lancet Oncology 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of Agency for Research on Cancer. Volume 136: Talc and acrylonitrile. Lyon, France; June 11–18, 2024. IARC Monogr Identif Carcinog Hazards Hum (in press).

6. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Report of Michael A. Finan, MD (Bondurant) dated May 28, 2024. ***(Filed under seal)***

7. Attached hereto as Exhibit 6 is a true and correct copy of the Third Amended Expert Report of Daniel Clarke-Pearson, MD (General) dated May 28, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Second Amended Expert Report of Daniel Clarke-Pearson, MD (MDL Converse) dated May 28, 2024. ***(Filed under seal)***

9. Attached hereto as Exhibit 8 is a true and correct copy of the transcript of the Deposition of Michael Finan, MD (MDL-Bondurant) dated June 26, 2024. ***(Filed under seal)***

10. Attached hereto as Exhibit 9 is a true and correct copy of the Second Amended Expert Report of Daniel Clarke-Pearson, MD (Rausa) dated May 28, 2024. ***(Filed under seal)***

11. Attached hereto as Exhibit 10 is a true and correct copy of the National Cancer Institute, Dictionary of Cancer Terms. “Definition of Risk Factor,” 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of Brewster, Wendy R. Epidemiology of Commonly Used Statistical Terms and Analysis of Clinical Studies, Chapt. 22.

13. Attached hereto as Exhibit 12 is a true and correct copy of the transcript of the Deposition of Daniel Clarke-Pearson, MD (MDL) dated February 4, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of the Third Amended Expert Report of Judith Wolf, MD (General) dated May 28, 2024.

15. Attached hereto as Exhibit 14 is a true and correct copy of Vineis, Paolo, Phyllis Illari, and Federica Russo. “Causality in Cancer Research: A Journey through Models in Molecular Epidemiology and Their Philosophical Interpretation.” Emerging Themes in Epidemiology 14, no. 7 (2017).

16. Attached hereto as Exhibit 15 is a true and correct copy of Wu, Song, Wei Zhu, Patricia Thompson, and Yusuf A. Hannun. “Evaluating Intrinsic and Non-Intrinsic Cancer Risk Factors.” Nature Communications 9, no. 1 (August 28, 2018): 3490.

17. Attached hereto as Exhibit 16 is a true and correct copy of Hunn, Jessica, and Gustavo C. Rodriguez. “Ovarian Cancer: Etiology, Risk Factors, and Epidemiology.” Clinical Obstetrics and Gynecology 55, no. 1 (March 2012): 3–23.

18. Attached hereto as Exhibit 17 is a true and correct copy of the National Cancer Institute. Ovarian, Fallopian Tube, and Primary Peritoneal Cancers Prevention (PDQ) Health Professional Version. March 6, 2024.

19. Attached hereto as Exhibit 18 is a true and correct copy of Mallen, Adrienne R., Mary K. Townsend, and Shelley S. Tworoger. "Risk Factors for Ovarian Carcinoma." Hematology/Oncology Clinics of North America, September 2018.

20. Attached hereto as Exhibit 19 is a true and correct copy of Park, H., et al. Benign gynecologic conditions are associated with ovarian cancer risk in African-American women: a case-control study. Cancer Causes & Control. 2018.

21. Attached hereto as Exhibit 20 is a true and correct copy of Maharaj-Gentry, Aleksandra, Michelle Griffin and Usha Menon. Cancer Prevention and Screening: Concepts, Principles and Controversies. In Rosalind A. Eeles, Christine D. Berg, and Jeffery S. Tobias (Eds.). 1st ed. Chapter 23. Accessed August 21, 2018.

22. Attached hereto as Exhibit 21 is a true and correct copy of Institute of Medicine (IOM) Committee on the State of Science in Ovarian Cancer Research. Ovarian Cancers: Evolving Paradigms in Research and Care. The National Academies of Sciences, Engineering and Medicine. Washington (DC): National Academies Press (US), 2016.

23. Attached hereto as Exhibit 22 is a true and correct copy of Phung, M et al. Effects of Risk Factors for Ovarian Cancer in Women With and Without Endometriosis. Fertil and Steril 2022.

24. Attached hereto as Exhibit 23 is a true and correct copy of Lheureux, Gourley, Vergote, Oza. Epithelial Ovarian Cancer. Lancet 2019; 393: 1240–53.

25. Attached hereto as Exhibit 24 is a true and correct copy of Terry, Kathryn L., et al. “Genital Powder Use and Risk of Ovarian Cancer: A Pooled Analysis of 8,525 Cases and 9,859 Controls.” Cancer Prevention Research (Philadelphia, Pa.) 6, no. 8 (August 2013): 811–21.

26. Attached hereto as Exhibit 25 is a true and correct copy of Schildkraut, Joellen M., et al. “Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES).” Cancer Epidemiology, Biomarkers & Prevention: A Publication of the American Association for Cancer Research, Cosponsored by the American Society of Preventive Oncology 25, no. 10 (2016): 1411–17.

27. Attached hereto as Exhibit 26 is a true and correct copy of Gordis, Leon, Epidemiology Fifth Ed., Chapter 14 “From Association to Causation: Deriving Inferences from Epidemiologic Studies,” (2013).

28. Attached hereto as Exhibit 27 is a true and correct copy of Siemiatycki, Jack.” Risk Factors for Cancer in the Workplace.”

29. Attached hereto as Exhibit 28 is a true and correct copy of the transcript of the Deposition of Daniel Clarke-Pearson, MD (MDL) dated August 26, 2021.

(Filed under seal)

30. Attached hereto as Exhibit 29 is a true and correct copy of the transcript of the Deposition of Daniel Clarke-Pearson, MD (MDL) dated March 8, 2024. *(Filed under seal)*

31. Attached hereto as Exhibit 30 is a true and correct copy of the transcript of the Deposition of Daniel Clarke-Pearson, MD (MDL) dated August 27, 2021. *(Filed under seal)*

32. Attached hereto as Exhibit 31 is a true and correct copy of Penninkilampi, Ross, and Guy D. Eslick. “Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis.” *Epidemiology* (Cambridge, Mass.) 29, no. 1 (January 2018): 41–49.

33. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell

P. LEIGH O'DELL

Dated: August 22, 2024